

**Minutes for Rule 21 Working Group Meeting #68**  
**July 13, 2005**  
**Southern California Edison**  
**Fontana, CA**

There were 22 Working Group members in attendance in person or conferenced in by telephone. The next regular meeting of the Working Group is scheduled for August 24, at PG&E in Oakland.

Scott Tomashefsky, Chair

Aldridge	Pat	SCE	Parks	Ken	SDG&E
Blair	Tom	City of SD	Perez	Rudy	SCE
Cook	Bill	SDG&E	Prabhu	Edan	Reflective Erg
Couts	George	SCE	Robinson	Mark	Nextek
DeLaTorre	Audel	SCE	Sandhu	Paul	PG&E
Edds	Michael	DG Ergy Solutions	Smith	Richard	SDG&E
Iammarino	Mike	SDG&E	Solt	Chuck	Lindh & Assoc
Jackson	Jerry	PG&E	Torribio	Gerome	SCE
Lacy	Scott	SCE	Tunnicliff	Dan	SCE
Mazur	Mike	3 Phases Ergy Serv	Vaziri	Mohammad	PG&E
McAuley	Art	PG&E	Whitaker	Chuck	BEW Engrg

## **Combined Process and Technical Group**

### **Utility DG Activity Reports**

Meeting materials included SDG&E and SCE DG status reports thru the end of June were available. PG&E will have the first and second quarter report by July 27.

### **Rule 21 Revisions Advice Letter Progress and Status**

PG&E announced at the meeting that they would file its Rule 21 Advice Letter Update on July 15. The utility indicated that the filing would include a number of unilateral changes, different from the language agreed upon in the model rule. Some WG members expressed concern about PG&E abandoning the consensus model rule and filing a modified version. The group suggested that PG&E file a model tariff change and present its language variations to the WG for consideration in the next revision.

Similar issues were raised regarding the advice letter filing that would modify PG&E's current version of the Application Form. PG&E offered several variations from the model application, which the WG questioned the need for such a departure. As many WG members noted, the current version of the model application was developed 10 months ago and the group reached consensus on these issues. The WG generally agreed that they would prefer that PG&E file an Advice Letter with the consensus Application Form and then make a request to the WG that the Application Form be reconsidered for modification. (Note: Subsequent to the meeting, PG&E agreed to revise its advice

letter filings to include model language, consistent with the WG recommendations. Advice Letter filings will be forthcoming shortly.)

### **CRS Quarterly Data Reports (Per CPUC Resolution E-3831)**

No progress to report.

### **FERC Order 2006 Update**

Cal ISO and the 3 IOUs held a conference Tuesday July 12 in its attempt to coordinate changes to wholesale interconnection agreements and tariffs. SCE has problems with timelines, in particular the Aug 12 requirement for filing. In accordance with the Order, the Cal ISO will be responsible for preparing system impact interconnection studies. It is not clear who would prepare required facilities studies.

### **Federal Energy Bill (S.10)**

The federal energy bill has now passed both houses and is in conference. Both the Senate (S.10) and House (HR.6) versions contain almost identical sections on interconnection. The Senate version (S.10 [section 1254](#)) was distributed to the WG for review. If adopted, this section will probably have no impact on Rule 21. We have already complied with the requirements of the section.

### **Proposed Decision on DG OIR Items from Rule 21 WG**

Scott Tomashefsky reported that the Proposed Decision from ALJ Malcolm on the 5 items introduced by the WG is close to completion. It is expected in days.

### **Discussion of Certification Process and Recertification timing**

Currently, Rule 21 calls for recertification and compliance with 1547.1 by January 1, 2006, however, the 1547.1 was just adopted last month, and the test/certification protocol, UL 1741 will not be complete later this year, and will include a 12-24 month grace period for manufacturers to bring their products into compliance. Rule 21 will need to be changed to accommodate implementation of 1741. Assuming advice filings are limited to a simple change in the effective date listed at the end of the last paragraph in Section J.1 (currently December 31, 2005), the utilities feel it will take at least 1 month to file Advice Letters,. Therefore, the WG needs to resolve this before November. This will be a key discussion topic for the August meeting.

### **PIER Funding**

Each year, the CEC's Public Interest Energy Research (PIER) program develops its workplan and considers various areas of research for funding. At the suggestion of Scott Tomashefsky and Moh Vaziri, the WG was requested to provide ideas suggesting interconnection-related research projects for PIER consideration. These ideas could be presented as a White Paper to PIER management and could be used as one tool to use in developing future research efforts.

### **Transfer Trip**

Bill Cook has completed discussion on Transfer Trip that will be incorporated into the Supplementary Review Guide. It was noted that transfer trip may be able to be incorporated into the Automated Metering Interface.

## **Redundant Relay Requirement**

PG&E's requirements regarding redundant relays are different from the other IOUs. PG&E indicated that they will communicate these requirements by publishing them on their web page and putting them into the PG&E Interconnection Handbooks. Chuck Whitaker does not like the fact there will be a consistent well-defined requirement that isn't clearly stated in the rule.

## **Process Breakout Group Notes**

### **Action Item P131 - *SDG&E Continuous Export Agreement***

SDG&E has two non-NEM projects that will export power under normal, prolonged operation. The standard Rule 21 interconnection agreement does not currently accommodate this operation. SDG&E needs to create an interconnection agreement for these projects. The projects must move quickly, and SDG&E cannot wait for the WG to develop a model agreement. SDG&E would like to file an Advice Letter with the CPUC by the end of August. Mike Iammarino (SDG&E) will prepare his document and share it with Gerry Torribio (SCE) and Jerry Jackson (PG&E). The SDG&E agreement will cover interconnection only and will not include the Power Purchase Agreement. Jerry Jackson will create a draft document, but probably not by the next meeting. PG&E leans toward merging the interconnection and operating agreements.

### **Action Item C147 - *Continued Review of Utility DG Reporting Needs.***

On June 30, R.05-06-040 opened an OIR looking at confidentiality of information. Phase II of this OIR might look at DG reporting and confidentiality issues. The group asked who reports DG data now. CARB has just completed a DG data gathering exercise for their 2005 review under SB 1298, but that was a one time only exercise. SCAQMD also has just completed a one time only data gathering exercise for IC engines. QF facilities are monitored and reported on a regular basis. SDG&E monitors all cogeneration to verify compliance with CRS exemptions.

A preliminary meeting on reporting needs is still planned before the joint agency meeting on reporting requirements.

## **Technical Breakout Group Notes**

Reviewed and modified the Action Item list. Added a new task (T139) to add a screen for transmission-related interconnections. We discussed a line configuration issue that was similar to the distribution line config issue, but enough different that it really should be dealt with separately. There are also other issues that must be considered in a transmission interconnection.

Agreed to address the re-certification date at the next meeting. Chuck Whitaker will find out what grace period UL 1741 will use. (Later: Probably 18 months, but should know more definitively by the next Rule 21 meeting.

Because there have been no particular issues raised yet, we agree to hold off on reviewing and modifying the Supplemental Review Guideline vis-à-vis IEEE 1547 changes until after we have incorporated 1547.1 as well (Q1 2006).

**T113 Backup/Redundancy** – PG&E has decided not to place their written redundancy requirements in the body of Rule 21 because of concerns it would create a difference between their Rule and the working group's model rule. They will, however, continue to apply their requirements as currently written. PG&E will also describe their requirements in their Interconnection Handbook and possibly on their web page. Moh Vaziri agreed to develop language to potentially include in the supplemental review guideline.

**T138 1547.1 v Rule 21** – Reviewed the first draft of a document comparing the relevant sections of IEEE 1547.1-2005 with the corresponding sections of Rule 21 Section J. Bill Cook suggested that we need to hold a two-day meeting to work through these issues, just as we did in 2003 with 1547. He offered to host the meeting at SDG&E.

**T131 Transfer Trip** – Discussed the few minor comments that Bill had received. Several people mentioned that they had not finished reviewing so we will accept comments up to the August meeting.